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| In the Matter of | ) | |
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| ACR Electronics, Inc. Request for Waiver of Section 95.1402(b) of the Commission's Rules | ) | WT Docket No. 15-85 |
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**ACR ELECTRONICS, INC. ADDENDUM TO RESPONSE TO COMMENTS OF THE UNITED STATES COAST GUARD (USCG) AND THE UNITED STATES SARSAT PROGRAM**

**Introduction**

On April 7, 2015, the Commission requested comment on the ACR Electronics, Inc. (ACR) request[1] seeking certification and use of a new personal locator beacon (PLB) – SARLink - that transmits a distress signal on 406.0-406.1 MHz for communication with the Cospas-Sarsat satellite system and supports two-way text messaging via the Iridium satellite system. SARLink does not also transmit a 121.5 MHz signal, however, and ACR therefore seeks a waiver of section 95-1402(b) of the Commission's Rules, which provides that all "406 MHz PLBs must contain, as an integral part, a homing beacon operating only on 121.5 MHz."[2]

On July 20, 2015, the USCG and SARSAT Program submitted comments[3] related to this matter. In their comments, the USCG requested that the Commission grant ACR's request as follows. "For the reasons set forth, the USCG and SARSAT Program respectfully request that the Commission only grant ACR's request at this time for limited use by government (Federal, State and local) agencies and high-risk commercial industry where potential users are certified and highly trained with an organized support activity or call center to manage and respond to calls."

On August 19, 2015, ACR submitted a response to the USCG and SARSAT Program submitted comments[4] related to this matter. ACR concurred with the comments of the USCG and SARSAT Program described therein and respectfully requested that the Commission grant ACR's request for limited use by government (Federal, State, or local) agencies and high-risk commercial industry where potential users are trained and with an organized support activity or call center to manage and respond to calls.

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[1] *Wireless Telecommunications Bureau Seeks Comment on ACR Electronics Request for Waiver*, WT Docket No. 15-85, DA 15-423 (rel. Apr. 7, 2015) (*Public Notice*), http://apps.fcc.gov/ecfs/comment/view?id=60001028379.

[2] 47 C.F.R. § 95.1402(b) (2014).

[3] *Wireless Telecommunications Bureau Seeks Comment on ACR Electronics Request for Waiver*, WT Docket No. 15-85, (posted Aug. 24, 2015) (*Public Filing*), http://apps.fcc.gov/ecfs/comment/view.action?id=60001098450.

[4] *Wireless Telecommunications Bureau Seeks Comment on ACR Electronics Request for Waiver*, WT Docket No. 15-85, (posted Aug. 19, 2015) (*Public Filing*), http://apps.fcc.gov/ecfs/comment/view.action?id=60001098016.

**Comments**

In the ACR response, it was noted that potential users would have an organized support activity or call center to manage and respond to calls. ACR recognizes that the Commission may desire to have additional clarification related to the referenced organized support activity or call center to manage and respond to calls.

Those limited use customers defined as government (Federal, State, and local) agencies and high-risk commercial industry, seek the use of SARLink specifically for its dual mode capability. While the 406 MHz capability is sought for its emergency distress messaging, the regular day to day use of the device will leverage the features and functions afforded by the Iridium Short Burst Data (SBD) modem. These SBD functions are used for personnel tracking and two-way text communication. Position reports are configurable with intervals ranging between every minute, to once per day. Two-way text communications is a function of the enterprise back-end server application that is managed through the command and control center.

The ability to use the Iridium functions of SARLink are predicated on the use of an enterprise back-end platform. Position reports are visualized on the mapping element of the platform. Geo-fences that trigger alerts or other actions are a function of the back-end platform. Two-way communication between SARLink and other devices as well as email routing is facilitated through the platform. Command and control, over-the-air configuration, and Iridium Only distress messaging, are all functions that are dependent on the back-end platform.

Government agencies and high-risk commercial industry currently operate handheld devices that utilize the Iridium SBD services for personnel tracking, two-way text communication, and Iridium distress messaging. These legacy devices are used in concert with a back-end server application as part of an overall command and control system that monitors the location of the devices and distress alerts, as well as providing two-way communication in areas that are not serviced by other wireless communication infrastructure. Combining 406 MHz Locator Beacon functionality with Iridium SBD augments the distress messaging capabilities that currently exist by providing a redundant and independent emergency notification.

SARLink was developed in consultation with government agency personnel and high risk industry representatives with an emphasis on the integration of SARLink data into existing back-end service platforms. The message protocol of SARLink is open, published, and compatible with existing agency owned or operated, back-end platforms. ACR acknowledges that the value of SARLink as a dual mode device is dependent on its use as part of a system comprised of an organized support activity or call center to manage and respond to calls. As such, ACR deems it reasonable to limit SARLink sales to those customers who have or use an existing back-end platform, or those that will acquire a back-end platform or service as part of the SARLink procurement. Additionally, SARLink will not be sold via any retail outlets.

For the reasons set forth in this addendum, ACR respectfully requests that the Commission grant ACR's request at this time for limited use by government (Federal, State, or local) agencies and high-risk commercial industry where potential users are trained and with an organized support activity or call center to manage and respond to calls. ACR offers to take additional actions previously submitted associated with labeling and documentation to ensure that the end user is informed and cognizant that the device does not contain a 121.5 MHz homer.

Thank you for your consideration of these comments.

Gerald J. Angeli 10/16/15

Gerald J. Angeli date
President and General Manager
ACR Electronics, Inc.